

)
v.)
)
Reilly Tar & Chemical Corporation,)
)
Defendant,)
)
and)
)
Daikin Applied Americas, Inc. and)
Super Radiator Coils LP,)
)
Prospective-Limited)
Intervenors.)
)

Limited Intervenors Daikin Applied Americas, Inc. and Super Radiator Coils LP, by and through their respective undersigned counsel, hereby move the Court pursuant to Section 113(i) (42 U.S.C. § 9613(i)) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §§ 9601-9675 (“CERCLA”) and Rule 24 of the Federal Rules of Civil Procedure, for an Order allowing them to intervene in this matter for the limited purpose of opposing entry of the Amended Consent Decree [Doc. No. 37]. This Motion is based upon Daikin Applied Americas, Inc. and Super Radiator Coils LP’s Joint Memorandum of Law, Declaration of Melinda W. Hahn, PHD, Declaration of Aaron L. Benker, and all the files, records and proceedings herein, and such evidence and argument as may be presented to the Court prior to the decision on this Motion.

Respectfully submitted,

Dated: June 2, 2020

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